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November 10, 2015

BY ECF

The Honorable Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: **Ying Li v. City of New York: Request Extension for Amended Complaint**
Civil Action No. 15 CV 1599 (PKC) (MDG)
MCB File No. 1257-84383

Dear Judge Chen:

This office along with Benno & Associates, P.C. and Law Office of Jenny Marashi represent the plaintiff Ying Li in the instant action. Mr. Gregory Radomisli of Martin Clearwater & Bell, LLP represents defendants Flushing Hospital Medical Center and Dr. Fernanda Kupferman. Ms. Qiana Smith-Williams of NYC Law Department Office of Corporation Counsel represents defendants for the City of New York.

At the pre-motion conference on October 13, 2015, the Court set dates of November 12, 2015 for plaintiff to file an amended complaint, December 12, 2015 for the respective defendants to file their pre-motion letters, and December 18, 2015 at 1pm for a second pre-motion conference.

Plaintiff requests and defendants do not oppose a one week extension to November 19, 2015 to file an amended complaint. This is Plaintiff's first request for an enlargement of time. Plaintiff does not oppose a one week extension for defendants to file pre-motion letters originally due

December 12, 2015. However, Mr. Radomisli is not available for a pre-motion conference until the week of January 4, 2015. Thank you for your consideration in this matter.

Respectfully submitted,

/s/

Corey Lee, Ameer Benno, and P. Jenny Marashi